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March 3, 2006

TO: Mr. Russell Hart, RPM
United States Environmental Protection Agency
Region V
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

FROM: Mr. David Curnock, PM, SECOR International Incorporated *Due*

RE: **MONTHLY PROGRESS REPORT/MEMORANDUM**
Area 9/10 Remedial Design
Southeast Rockford Groundwater Contamination Superfund Site
Rockford, Illinois

Copies: Mr. Thomas Turner, Regional Counsel, USEPA Region V
Mr. Scott Moyer, Hamilton Sundstrand/United Technologies Corporation
Ms. Kathleen McFadden, United Technologies Corporation
Mr. Thomas Williams, PM, IEPA
Mr. Terry Ayers, IEPA

CURRENT MONTH PROJECT ISSUES/STATUS: *(activities, meetings, deliverables, etc.)*

Activities conducted in February 2006 consisted of the continuation of Pre-Design Investigation and conceptual design activities. The area of focus at this time with respect to the overall Remedial Design is a portion of the area beneath the Hamilton Sundstrand (HS) Plant #1. There has also been active free product recovery in the South Alley area of the site.

The area beneath the HS facility has been identified as a location of potential source material based on down-gradient groundwater monitoring results. The most likely location of the potential source material is associated with the former area of underground storage tanks (USTs) which were in the central portion of the plant south of the loading dock area.

As communicated to you in January 2006, HS announced a business decision to realign future operations at the facility. This decision will likely result in major changes at the facility including a reduced building footprint, a reduction in the manufacturing capacity, and a reduction in personnel. The detailed plans and associated timelines for these changes are now being developed. As an end result of the facility realignment, it appears that the conditions that restricted access to areas within the western portion of the building will not likely be site constraints in the future. We will keep the USEPA informed as the actual timeframe of the manufacturing capacity reduction and as partial building demolition activities unfold. Discussions are proceeding regarding these activities, however, no firm plans or schedules have been defined to date.

During February 2006, some initial feedback on the recently submitted Horizontal Groundwater Monitoring Well Installation and Testing Work Plan was received from

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USEPA. Although changes at the facility are imminent, this work plan was prepared and submitted consistent with the commitment made by HS to keep the remedial design (RD) activities moving forward.

As discussed with you on March 2, 2006, based on the anticipated changes at the facility, HS is beginning to evaluate a phased Remedial Design. The initial phase would address a portion of the South Alley area and the outside storage container area (OSA). These activities would replace the Horizontal Groundwater Monitoring Well Installation and Testing Work Plan. Rationale for this change is based on the belief that areas of the facility will become available within the next eighteen months. Knowing that areas will become available, a horizontal drilling approach could be problematic due to logistics of obtaining access and clearance of utilities.

Subsequent RD activities would be predicated on additional data or information gathered as areas within the building footprint become available. It is desired that USEPA and HS keep an open dialogue regarding the performance and timing of the continued source identification and remedial design activities for Area 9/10.

The operation and monitoring of hydrocarbon recovery of LNAPL (JP-4) from the recovery systems in the south alley continues. February activities consisted of monitoring of the recovery system operation. The measured thickness of product in wells RW-1, RW-2 and RW-3R have been reduced to 0.03 feet, 0.04 feet, and 0.05 feet, respectively as of February 23, 2006.

FUTURE PROJECT ISSUES/STATUS: *(activities, meetings, deliverables, etc.)*

Future project activities anticipated for March 2006 and beyond include:

- Final preparation and submittal of the Pre-Design Investigation Data Summary Report. This report includes boring logs, figures, groundwater water level and flow information, and all laboratory analyses undertaken as part of the Pre-Design Investigation to date;
- Continue collection of water and product level data from the groundwater monitoring network on a periodic basis (next event scheduled for March).
- Operation, maintenance, and monitoring of the South Alley recovery well system and evaluation of the LNAPL (JP-4) presence and recovery rates will continue; and
- Development of specific projects and timelines associated with the facility realignment and communication of these final plans with USEPA.

SAMPLE/TEST DATA SUBMITTALS:

None.

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RD SCHEDULE UPDATE: *(attach updated schedule as necessary)*

As the activities associated with the Pre-Design Investigation portion of the Remedial Design (RD) continue, the overall schedule continues to be revised.

With the many changes going on at the facility and the opportunity for substantial site constraints to be removed as part of the facility realignment process, it is desired that an open dialogue regarding the performance and timing of the continued source identification and remedial design activities for Area 9/10 be maintained at this time.

REALIZED/ANTICIPATED PROBLEM CONDITIONS:

The Pre-Design Investigation report final preparation was delayed in February. The document will be submitted in March.

PERSONNEL CHANGES:

None.